

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL - 2 2014

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
vs.)
TODD SCOTT,)
Defendant.)

No.

S1-4:14CR00093 SNLJ/SPM

SUPERSEDING INDICTMENT

COUNT I

The Grand Jury charges that:

On or about November 11, 2013, in St. Louis City, in the Eastern District of Missouri,

TODD SCOTT,

the defendant, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly possess a firearm, to wit: a .45 caliber Kimber semiautomatic pistol bearing serial number KR101683, said firearm having previously traveled in interstate or foreign commerce.

In violation of Title 18 United States Code, Section 922(g)(1).

COUNT II

The Grand Jury further charges that:

On or about November 11, 2013, in St. Louis City, in the Eastern District of Missouri,

TODD SCOTT,

the defendant, did possess with the intent to distribute in excess of fifty grams of a mixture or substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code Section 841(a)(1) and punishable under Title 21, United States Code Section 841(b)(1)(B).

COUNT III

The Grand Jury further charges that:

On or about November 11, 2013, in St. Louis City, in the Eastern District of Missouri, the defendant,

TODD SCOTT,

during and in relation to the drug trafficking crime set forth in Count II, used and carried a firearm, to wit: a .45 caliber Kimber semiautomatic pistol bearing serial number KR101683.

In violation of Title 18, United States Code, Sections 924(c)(1).

COUNT IV

The Grand Jury further charges that:

On or about November 12, 2013, in St. Louis City within the Eastern District of Missouri,

TODD SCOTT,

the defendant herein, did possess with the intent to distribute a detectable quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code Section 841(a)(1) and punishable under Title 21, United States Code Section 841(b)(1)(C).

COUNT V

The Grand Jury further charges that:

On or about November 12, 2013, in St. Louis City within the Eastern District of Missouri,

TODD SCOTT,

the defendant herein, having sustained a conviction punishable by more than one year

imprisonments under the laws of the United States, did knowingly possess a firearm, to wit: a Forjas Taurus, S.A. .38 special caliber revolver bearing serial number 1210147 (defaced), said firearm having previously traveled in interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT VI

The Grand Jury further charges that:

On or about November 12, 2013, in St. Louis City within the Eastern District of Missouri,

TODD SCOTT,

the defendant herein, during and in relation to the drug trafficking crime set forth at Count IV, used and carried a firearm, to wit: a Forjas Taurus, S.A. .38 special caliber revolver bearing serial number 1210147 (defaced).

In violation of Title 18, United States Code Section 924(c).

COUNT VII

The Grand Jury further charges that:

On or about November 12, 2013, in St. Louis City within the Eastern District of Missouri,

TODD SCOTT,

the defendant herein, knowingly possessed a firearm the serial number of which had been altered and obliterated, to wit: a Forjas Taurus, S.A. .38 special caliber revolver bearing serial number 1210147 (defaced), such firearm having previously traveled in interstate commerce.

In violation of Title 18, United States Code Section 922(k).

COUNT VIII

The Grand Jury further charges that:

On or about January 23, 2014, in St. Louis City within the Eastern District of Missouri,

TODD SCOTT,

the defendant herein, having sustained a conviction punishable by more than one year imprisonments under the laws of the United States, did knowingly possess firearms, to wit: (1) a Kahr 9 millimeter semi-automatic pistol bearing serial number ED4388 and (2) a Rohr .22 LR caliber revolver bearing serial number 129966, said firearms having previously traveled in interstate and foreign commerce.

In violation of Title 18, United States Code Section 922(g)(1).

COUNT IX

The Grand Jury further charges that:

On or about January 23, 2014, in St. Louis City within the Eastern District of Missouri,

TODD SCOTT,

the defendant herein, while an unlawful user of controlled substances, did knowingly possess firearms, to wit: (1) a Kahr 9 millimeter semi-automatic pistol bearing serial number ED4388 and (2) a Rohr .22 LR caliber revolver bearing serial number 129966, said firearms having previously traveled in interstate commerce.

In violation of Title 18, United States Code Section 922(g)(3).

A TRUE BILL

FOREPERSON

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